UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SANDRA (SANDY) KANE

15 CV 0428

(In the space above enter the full name(s) of the plaintiff(s).)

COMPLAINT

-against-

N.Y.P.D. and The City of NEW YORK

Jury Trial: ☑ Yes ☐ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

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I. **Parties in this complaint:**

A. List your name, address and telephone number. If you are presently in custody, include your identification number and the name and address of your current place of confinement. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff
Name SANDRA (SANDY) KANE
Street Address 400 W. 43 St. APT. 6K
County, City NEW YORK, N.Y.
State & Zip Code NEW YORK 10036
Telephone Number 917 889-5138

B. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1
Name The City of New York + N.Y.P.D.
Street Address

County, City ______________________________
State & Zip Code ______________________________
Telephone Number ______________________________

Defendant No. 2

Name ______________________________
Street Address ______________________________
County, City ______________________________
State & Zip Code ______________________________
Telephone Number ______________________________

Defendant No. 3

Name ______________________________
Street Address ______________________________
County, City ______________________________
State & Zip Code ______________________________
Telephone Number ______________________________

Defendant No. 4

Name ______________________________
Street Address ______________________________
County, City ______________________________
State & Zip Code ______________________________
Telephone Number ______________________________

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. Only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than $75,000 is a diversity of citizenship case.

A. What is the basis for federal court jurisdiction? *(check all that apply)*

☐ Federal Questions ☐ Diversity of Citizenship

B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? Civil Rights

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship ______________________________
Defendant(s) state(s) of citizenship ______________________________

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events.

You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur?
45th St AND 7th AVE (CORNER) N.Y.C.

B. What date and approximate time did the events giving rise to your claim(s) occur?
APRIL 26, 2014 3P.M.

C. Facts: On APRIL 26 at about 3PM I was doing my job as I have been doing for 7 years as the "NAKED COWGIRL", playing my guitar and singing my original country songs, when SARGEANT Michael DiTRICK pulls up to the Curb, jumps out of a police VAN AND "traumatized me" as he ARRESTS ME FOR HAVING AN "UNATTENDED PACKAGE" which was my vinyl guitar case propped up against a garbage can one foot from me, and as much as I TRIED to tell him it was my guitar case, I was handcuffed by about 3 officers and WALKED to the police station on 43 + BROADWAY. They arrested me, FRISKED me, took away my guitar which had some tips in, it took the money out, then threw me in a police car and drove me to the police station on 35th St. + 9th AVE. + threw me in a cell for 6 hours.

What happened to you?

Who did what?

Was anyone else involved?

Who else saw what happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received.

I was so "traumatized" by what happened because I have never been arrested before that I CRIED for a week after it happened & didn't go back to WORK IN times square for a week! I went to my DR ISSA & he gave me prescription for ZANEX to calm my nerves and also missed 2 days of work from the day I was arrested & the day I had to go to court & stayed for 4 hours and the judge laughed when she heard the case & QUICKLY dismissed it!

P.S. AND WHEN I WAS ROBBED OF ALL MY POSSESSIONS 3 times WHEN I WORKED AS NAKED COWGIRL IN timesquare + I went for help to 43 St. station, the COPS DID ABSOLUTELY NOTHING to HELP ME!

V. **Relief:**

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation. I want $2,000,000 from NEW YORK City AND the N.Y.P.D. not only for this incident but for ALL the other incidents the NYPD has caused, harassed & abused me by cops who have no REASON being hired as cops, the rookies + the bully SARGEANT DITTRICK who arrested me for just doing my job as The "NAKED COWGIRL" A Job I have been doing for 7 years! And the SARGEANT IS lying saying people were tripping over my guitar case + it WAS AN "UNattended package!" I have never been ARRESTED before + its criminal that a MANHATTAN RESIDENT since I'm 18 who REbuilt TimeSQUARE + GAVE MANY PEOPLE JOBS + MADE MANHATTAN + Timesquare history, be arrested probably because the cop needed to fill his arrest quota + cause I WAS topless.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this ___ day of ______________, 20__.

Signature of Plaintiff: Sandra (Sandy) Kane

Mailing Address: 400 W. 43 St. Apt. 6K
NEW YORK, N.Y. 10036

Telephone Number: 917 889-5138

Fax Number *(if you have one)*: SANDY.KANE6969@GMAIL.COM
E #

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint. Prisoners must also provide their inmate numbers, present place of confinement, and address.

For Prisoners:

I declare under penalty of perjury that on this _____ day of _________________, 20__, I am delivering this complaint to prison authorities to be mailed to the *Pro Se* Office of the United States District Court for the Southern District of New York.

Signature of Plaintiff: ______________________

Inmate Number ______________________

FROM:
Sandra Kane
400 W. 43St #6K
New York, NY 10036

TO:
United States District Court
Southern District of NEW YORK
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